



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 25, 2016

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Ahmed Mohammed El Gammal, 15 Cr. 588 (ER)

Dear Judge Ramos:

The Government writes in response to the defendant's October 25, 2016 letter requesting a conference this week to discuss the Government's Draft Exhibit List, Arabic-language translations, and the defendant's objections to the Government's October 17, 2016 expert notice. A conference this week on these issues would be premature given that at least one of these issues—the defendant's objections to the Government's October 17 expert notice—has not yet been fully briefed and the Government will be filing its response on Monday, October 31 along with its opposition to the defendant's motions *in limine*. The Government will, of course, appear for a conference this week if the Court is available and wishes to see the parties, but believes it would be more efficient to appear after these issues are fully briefed. Based on our correspondence with defense counsel, we understand that they are concerned about meeting certain deadlines in light of the issues they raise in their letter requesting a court conference. To the extent the defendant is seeking a reasonable extension of certain deadlines until these issues are fully briefed on Monday, October 31, we of course, would have no objection to such a request.

Respectfully submitted,

PREET BHARARA
United States Attorney

By:

/s/
Andrew J. DeFilippis
Brendan F. Quigley
Negar Tekeei
Assistant United States Attorneys
(212) 637-2231/2190/2482

cc: Sabrina P. Shroff/Annalisa Mirón/Daniel Habib (by ECF)
Counsel for Ahmed Mohammed El Gammal